



## **II. ARGUMENT AND AUTHORITIES**

Rule 15(a)(2) provides that "[t]he court should freely give leave when justice so requires." FED. R. CIV. P. 15(a)(2). The Fifth Circuit recognizes that leave to amend should generally be granted absent undue delay, bad faith, dilatory motive, repeated failure to cure deficiencies, undue prejudice, or futility. See *Smith v. EMC Corp.*, 393 F.3d 590, 595 (5th Cir. 2004).

Here:

- Plaintiff seeks to more precisely set forth his claims;
- No undue prejudice will result to Defendants; and
- Plaintiff will file a clean and redlined version of the proposed amended complaint, in compliance with Local Rule 15.1.

## **III. PRAYER**

For these reasons, Plaintiff respectfully requests that this Court grant leave to file the attached Amended Complaint and for such other relief to which he may be justly entitled.

Respectfully submitted,

/s/ Cedric Willis  
Cedric Willis, Pro Se  
612 Griffith Park Trail  
Alvarado, Texas 76009  
(817) 504-6141  
[cedricwillis49@yahoo.com](mailto:cedricwillis49@yahoo.com)

Date: April 29, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, I served a true and correct copy of the foregoing Plaintiff's Motion for Leave to File Amended Complaint, together with the proposed amended complaint, upon the following parties via the Court's CM/ECF electronic filing system or by email and/or first-class mail:

### **Via Email:**

Clare V. Cougill and Scott Lloyd Luna  
Robertson, Anschutz, Vettters, LLC  
10375 Richmond Avenue, Suite 200  
Houston, TX 77042  
Email: [litigation@revdocs.com](mailto:litigation@revdocs.com)

David Talbot  
Dinsmore & Shohl, LLP  
600 Travis Street, Suite 350  
Houston, TX 77002  
Email: [David.Talbot@dinsmore.com](mailto:David.Talbot@dinsmore.com)

### **Via First-Class Mail:**

George C. Scherer  
GHIDOTTI | BERGER LLP  
16801 Addison Road, Suite 350  
Addison, TX 75001

/s/ Cedric Willis Pro Se  
612 Griffith Park Trail  
Alvarado, TX 76009  
Email: [cedricwillis49@yahoo.com](mailto:cedricwillis49@yahoo.com)

/s/ Cedric Willis  
Cedric Willis, Pro Se